

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAENEAN LIGON, et al.

Plaintiffs,

-versus-

CITY OF NEW YORK, et al.

Defendants.
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: 12 Civ. 2274 (SAS)(HBP)
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: **DECLARATION OF**
: **DANIEL MULLKOFF**
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1. I am an attorney representing the plaintiffs in this matter.
2. I submit this declaration in support of the Plaintiffs' Motion for Preliminary Injunction. Attached to this declaration are documents referenced in the plaintiffs' pre-hearing memorandum of law. The plaintiffs expect to offer additional documents into evidence as exhibits at the hearing.
3. Attached hereto as Exhibit A is a true and correct copy of NYPD Interim Order 22, "Revision to Patrol Guide 212-59, 'Vertical Patrol,'" issued May 21, 2012.
4. Attached hereto as Exhibit B is a true and correct copy of NYPD Interim Order 23, "Trespass Affidavit Program," issued May 21, 2012.
5. Attached hereto as Exhibit C is a true and correct copy of excerpts from an NYPD Legal Bureau document titled, "Legal Guidelines for Citizen Encounters in Trespass Affidavit Buildings," dated January 1999.
6. Attached hereto as Exhibit D is a true and correct copy of excerpts from an NYPD Legal Bureau document titled, "Street Encounters: Stop, Question, and Frisk."

7. Attached hereto as Exhibit E is a true and correct copy of the Report of Plaintiffs' Expert Dr. Jeffrey Fagan and Appendices, dated July 27, 2012.

8. Attached hereto as Exhibit F is a true and correct copy of a letter from Jeannette Rucker, Chief of Arraignments and Complaint Room at the Bronx District Attorney's Office, to Chief Joan Jaffe, Chief of the NYPD Housing Bureau, dated April 15, 2009.

9. Attached hereto as Exhibit G is a true and correct copy of a letter from Jeannette Rucker, Chief of Arraignments and Complaint Room at the Bronx District Attorney's Office, to Deputy Inspector William McSorley, dated July 7, 2011.

10. Attached hereto as Exhibit H is a true and correct copy of a letter from Jeannette Rucker, Chief of Arraignments and Complaint Room at the Bronx District Attorney's Office, to Inspector Kerry Sweet, Executive Officer of the NYPD Legal Bureau, dated July 18, 2012.

11. Attached hereto as Exhibit I is a true and correct copy of a memorandum from Meera Joshi, First Deputy Executive Director of the Civilian Complaint Review Board, dated February 16, 2010.

12. Attached hereto as Exhibit J is a true and correct copy of excerpts from the deposition of Deputy Commissioner Julie Schwartz, taken on December 6, 2011 in *Davis v. City of New York*, and produced by the defendants to the plaintiffs in this matter.

13. Attached hereto as Exhibit K is a true and correct copy of a memorandum from Meera Joshi, First Deputy Executive Director of the Civilian Complaint Review Board, dated September 28, 2010.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read 'DMullkoff', written over a horizontal line.

DANIEL MULLKOFF

Dated: September 24, 2012
New York, N.Y.